



# Welcome to the Automotive Body & Repair Compliance Workshop

*Brought to you by the*  
**Negocio Verde Environmental Justice  
Task Force**

# Hazardous Waste and Materials Management *plus* Pollution Prevention Strategies

Presented by  
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**“Compliance with laws and regulations is the first step towards pollution prevention.”**



# Common Hazardous Waste Violations & How to be in Compliance

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## ■ HAZARDOUS WASTE VIOLATIONS

- Illegal Disposal of Hazardous and / or Universal Waste
- Containers not kept closed
- Sanding Waste
- Oil Spills
- No labels on containers



# Haz Mat Inspections

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- Conducted every 18 months
- May be generated by citizen complaints
- Inspections are unannounced
- Inspections are wall to wall / fence to fence
- Cover all Hazardous Waste and Material Regulations and Laws



# Haz Mat Inspectors will even ....

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## **Look in your dumpster!**



# Sometimes they will even jump in....

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**SERIOUSLY.....**



# What will they find?

## Non-empty aerosol cans



## Non-empty paint cans



# What is “CALIFORNIA EMPTY”?

## ■ Aerosol Cans:

- When the propellant and product are completely gone, there is no more ppsstttt....

## ■ Pourable Liquid Containers:

- Empty is when there is no longer a pourable and / or spillable product from the container.

## ■ Non-Pourable Containers:

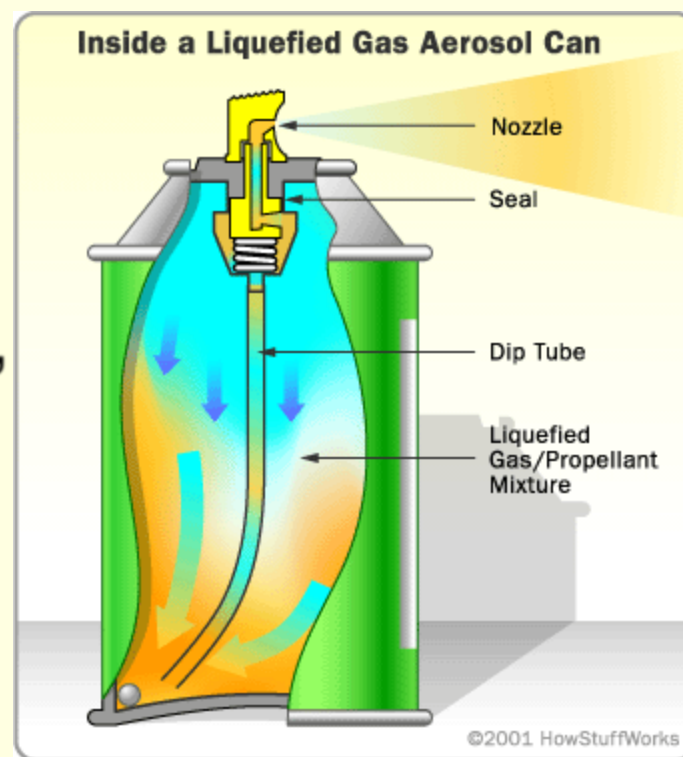
- No hazardous material shall remain that can feasibly be removed by scraping, chipping, etc.



**POURABLE!**

# Why is an Aerosol Can Hazardous?

- Propellant component is ignitable, toxic and under pressure
- Chemical component is ignitable, corrosive, reactive, or toxic.
- **Examples:** Aerosols containing paint, pesticides and degreasers likely to be hazardous when discarded.



# They Explode Too!

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# Aerosol Cans – Depends on YOUR hauler

## ■ Universal Waste



A purple rectangular label with white text. The top half has the words "UNIVERSAL WASTE" in large, bold, white capital letters. Below this, there is a white rectangular area containing several lines of text for information entry: "CONTENTS", "ACCUMULATION START DATE", "SHIPPER", "ADDRESS", and "CITY, STATE, ZIP". Each line is followed by a horizontal line for writing. At the bottom of the white area, there is a small line of text: "EPA 600/4-91/010".

## ■ Hazardous Waste



A yellow rectangular label with a red border and a red dotted pattern. The top half has the words "HAZARDOUS WASTE" in large, bold, red capital letters. Below this, there is a section of text in red: "FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCE CONTROL." This is followed by a section for "GENERATOR INFORMATION" with fields for "NAME", "ADDRESS", "CITY", "STATE", "ZIP", "PHONE", "EPA ID NO.", "MANIFEST NO.", "EPA WASTE NO.", "CA. WASTE NO.", and "ACCUMULATION START DATE". Below this is a section for "CONTENTS COMPOSITION" with fields for "PHYSICAL STATE" (SOLID, LIQUID), "HAZARDOUS PROPERTIES" (CORROSIVE, REACTIVITY, OTHER), "FLAMMABLE", and "TOXIC". At the bottom, there is a section for "HANDLE WITH CARE!" with a line for "EPA ID NO. AND UN OR NA NO. WITH PREFIX".

# Want to Stop Using Aerosols? Try Refillable Spray Bottles



## ■ Two types:

- Metal bottles that spray product using compressed air.
- Plastic bottles that use a hand pump to spray product.





# Universal Waste

- **Fluorescent Bulbs & Tubes**
  - Have mercury in them.
  - Businesses have arrangements with supplier.
  - Cannot be put into dumpster
- **Must be recycled!**





# Why Use Fluorescent Lamps and Tubes?



- Three to four times more energy-efficient.
- Cost less to use.
- Reduce greenhouse gas emissions and other pollution from energy production.
- Last up to ten times longer than standard incandescent light bulbs.



# What to Look For When Buying Fluorescent Lamps and Tubes

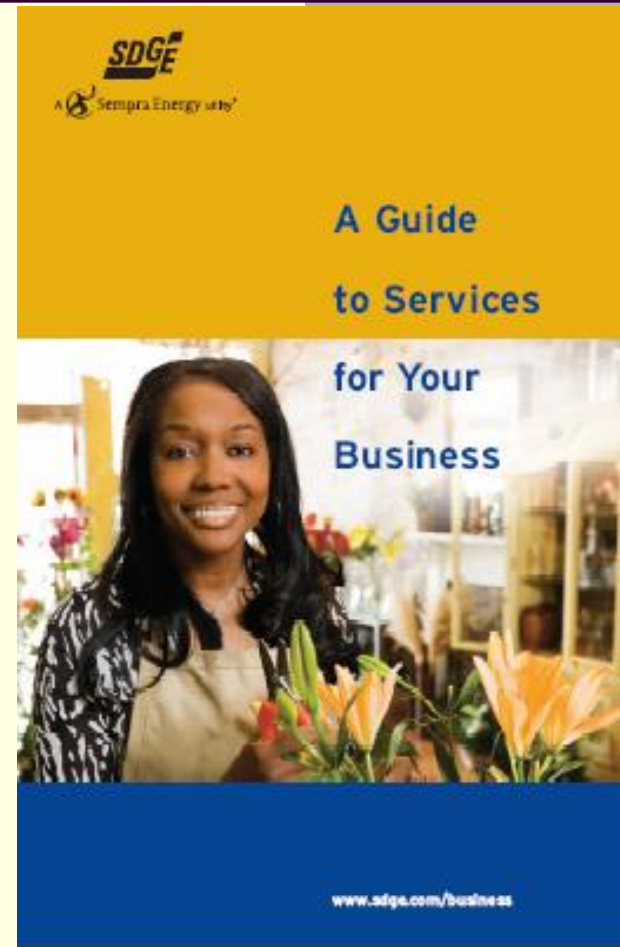
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- Energy efficiency, lumens per watt.
- Long lamp life - minimum of 20,000 hours rated life. (Extend lamp life and conserve energy by turning lights off when not in use.)
- Manufacturers or vendors that promote or assist with recycling.

[www.energystar.gov/index.cfm?c=cfls.pr\\_cfls\\_lumens](http://www.energystar.gov/index.cfm?c=cfls.pr_cfls_lumens)

# Interested in other Energy Saving Tips?

Grab a booklet  
from the  
Hazardous  
Materials Division  
table.



# **Back to Hazardous Waste Violations**

# Lead Acid Battery

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- Sits on the ground and leaks contents on ground
- Violations:
  - Lead acid batteries not properly managed.
  - Unauthorized disposal of hazardous waste.
  - Plus others depending on other conditions.
- Contaminated ground will have to be removed and managed as hazardous waste.



# Lead Acid Batteries

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- Off ground and cover.
- If not recycled, then hazardous waste





# **VIOLATION**

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## **HAZARDOUS WASTE CONTAINERS NOT CLOSED**



# Hazardous Waste Containers

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- Must be kept closed – except when adding or removing waste!
- Train employees to do remember to close containers
- Use a funnel, easier to pour
- Spill Prevention is Pollution Prevention



# Open Containers

- This container is not closed.
- It rained, used oil spilled over from container onto ground.
- Notice oil sheen on ground.



**violation**

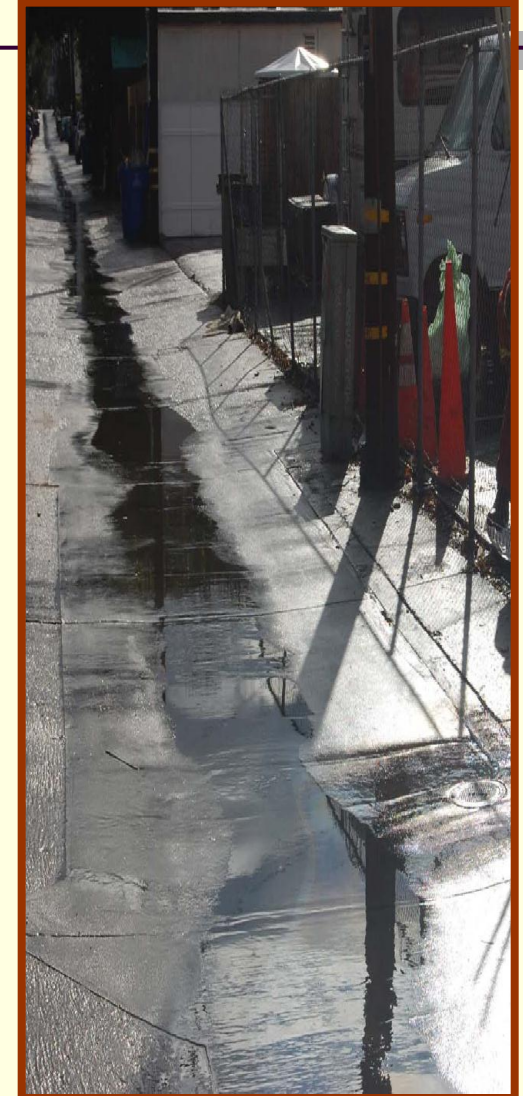


**Sheen was followed  
to.....**



# Down the Street to a Storm Drain

- Storm Water Violation
- Illegal Disposal of Hazardous Waste
- Did not maintain facility to prevent release
- All because of someone did not put the bung in the drum!
- Close all Containers – it may be costly and damaging to the environment!



# Sanding Waste – Hazardous?



- Sanding waste may be toxic if it contains heavy metals such as cadmium, chromium, nickel, copper, lead, and zinc – Title 22 metals.
- Must either be tested or business must demonstrate knowledge that the dust is not hazardous.

# Toxic = Hazardous Waste

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- The test to determine if waste is toxic is a Fish Test
- The fish are exposed to waste
- After time if some of the fish die = TOXIC!
  
- If fish are dying, what is it doing to you?
- To your co-workers?
- To your neighbors?
- To your family?
- To your community?



# Don't Forget .....

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- **Bead Blast Dust Waste**
  - This is most likely hazardous also!



# Wet Sanding vs. Dry Sanding

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- Dry Sanding is preferred because Wet Sanding introduces another waste stream contaminated water.
- If you must “wet sand” then use as little water as possible, collect contaminated water so it does not enter gutters, storm drains or sewer.
- Have waste hauled off site by service contractor. If hazardous, must be hauled off by a hazardous waste hauler and if not, the grit must be disposed of as solid waste –

**NOT DOWN THE SEWER OR STORM DRAIN!**

# Vacuum Sander

- More efficient vacuum sanding system
- Word from businesses that use this:

*“Takes longer to sand,  
but there is no clean up,  
employee does not need to wear  
respirator and  
delivers a cleaner product”*



- Sweeping is a good practice but vacuum sanding to keep waste off the floor is better!



# Auto Body

- Nothing but rain water can go down the drain!
- **Stormwater Violation**
- If wastewater is a hazardous waste then it is also an **illegal disposal of hazardous waste violation!**





# Spill Prevention and Floor Cleanup



# Secondary Containment and Roll Around Drip Pans

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# Gasoline or solvent spill?

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Yes → Absorbents

If No → next slide...

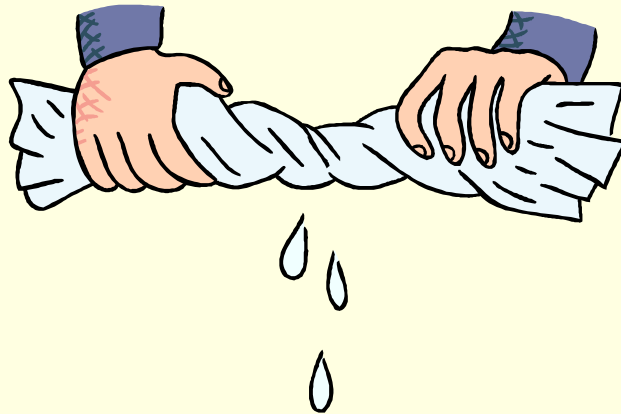


# Cleanup with less than 3 rags?

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If Yes → Use the rags

If No → Four-step Floor Cleanup



# Four-Step Floor Cleanup





# Step 1: Oil Spill First

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**Use  
hydrophobic  
mop.**



## Step 2: Antifreeze Spill?

**Use  
dedicated  
antifreeze  
mop.**



## Step 3: Dry Surface

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**Wipe up  
with rags.**

**Do not  
saturate.**



# Step 4: Wet Mop

**Use mild,  
non-  
caustic  
detergent.**





# **VIOLATION**

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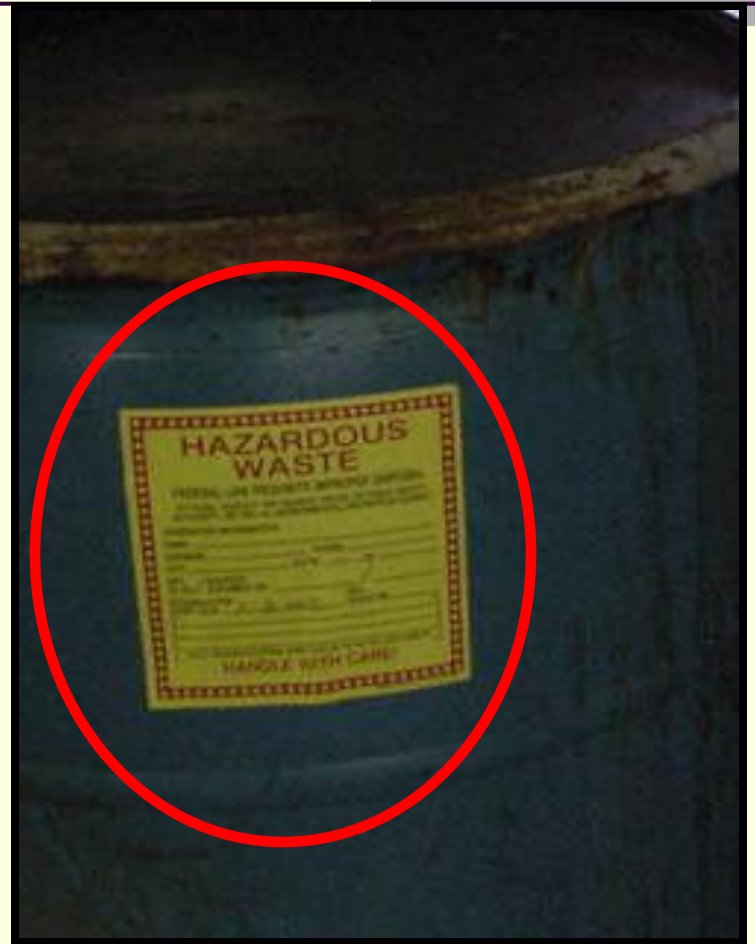
**Hazardous Waste Container Not  
Labeled and / or Not Labeled  
Properly**

**All Hazardous Waste Containers  
must be Properly Labeled when the  
First Drop of Waste goes in!**



# All Hazardous Waste Containers

- Must be labeled as “HAZARDOUS WASTE”
- Name & address of business
- Physical composition and properties of waste
- Accumulation start date



# HAZARDOUS WASTE

## STATE & FEDERAL LAW PROHIBIT IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY,  
THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR  
THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL

PROPER D.O.T. SHIPPING NAME:

UN OR NA #:

GENERATOR'S NAME AND ADDRESS:

NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

CITY: \_\_\_\_\_ STATE: CA ZIP: \_\_\_\_\_

GENERATOR'S EPA ID NUMBER:

MANIFEST TRACKING  
NUMBER: \_\_\_\_\_

ACCUMULATION START DATE:

\_\_\_\_ / \_\_\_\_ / \_\_\_\_

CA WASTE NUMBER:

\_\_\_\_\_

EPA WASTE NUMBER:

\_\_\_\_\_

CONTENTS, COMPOSITION: \_\_\_\_\_

PHYSICAL STATE:

☐ SOLID ☐ LIQUID

HAZARDOUS PROPERTIES:

☐ CORROSIVE ☐ REACTIVE ☐ OTHER

☐ FLAMMABLE

☐ TOXIC

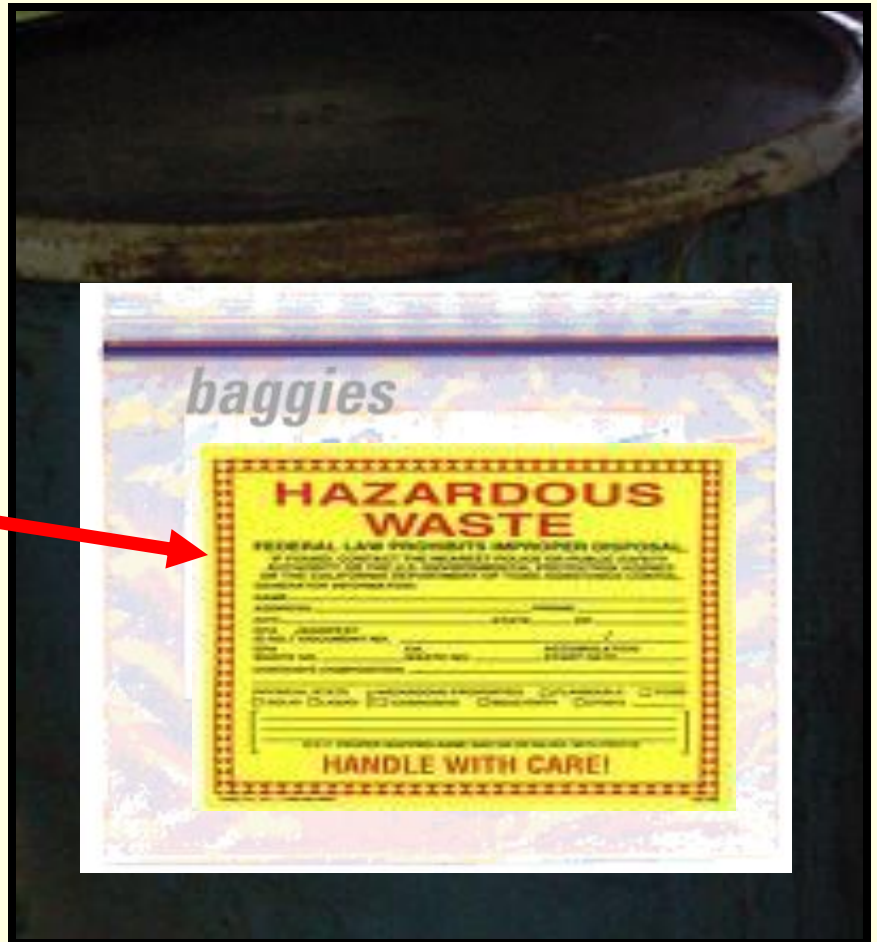
COMPLETE  
FOR  
STORAGE

**HANDLE WITH CARE!**  
CONTAINS HAZARDOUS OR TOXIC WASTES

COMPLETE  
FOR  
TRANSPORT

# How to keep a clean, readable label on an oily drum?

Place the filled out label in a plastic baggie and duct tape it to the drum.



# Auto Compliance Binders

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- Free to each business
- Sections for:
  - Hazardous Materials / Waste Paperwork
  - Air Pollution Control District paperwork
  - Stormwater Paperwork
  - Energy Tips for Small Businesses



Take a Break